

Exhibit C

Richard Daoust

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Knight, et al. v. The Islamic Republic of Iran</i> | 18-cv-12398 (GBD)(SN) ECF Case |

DECLARATION OF RICHARD DAOUST

I, Richard Daoust, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred.
4. On the morning of September 11, 2001, I was a Sergeant with the New York Police Department (NYPD) assigned to Queens Narcotics. When we learned of the attacks on the WTC, we assembled at the station as part of the disaster response mobilization. We were taken by bus from Queens into Lower Manhattan. The Long Island Expressway was closed to inbound traffic except for emergency response vehicles. Firetrucks, police vehicles and ambulances were lined up as far as you could see heading into New York.
5. We arrived at the scene shortly after the towers collapsed, around 11:00 a.m. It was total chaos. People were running away from the buildings. It was difficult to see anything due to the fires, smoke, and ash. The air was also full of debris from the buildings. The air had a very

distinct smell that is difficult to describe, but that is unforgettable for those of us who were there. It did not smell like a normal fire.

6. We were assigned the task of protecting the site by keeping unauthorized people and vehicles away from the area and controlling the flow of traffic for first responders going in. I was with several other officers across the street from the WTC. The first day we had no protective equipment with us. My eyes, nose, and throat burned from exposure to the smoke, ash, and whatever chemicals were in the air. On the second day, the Department gave us masks with filters. We were eventually given hardhats, work gloves and goggles.

7. The morning of September 12th I recall walking on top of what had been the WTC with firemen listening for anyone who might be trapped underneath the pile of debris, hoping we could find someone. I worked on the pile that morning along with others in a "bucket brigade" removing debris by hand.

8. I stayed on site for over twenty-four hours. On the evening of the September 12th, I went back to our station in Queens to get a shower, change clothes and get some rest. I was covered in ash. I did not go home for three days. We worked in the rescue and later in the recovery effort every day for six weeks following September 11. Our assignments differed from day to day and included traffic control around the site of the attacks, the morgue, or working on the conveyor at Fresh Kills Landfill on Staten Island looking for evidence and human remains in the rubble being brought from the WTC.

9. I did not notice any adverse health effects until more than six months after we left the site of the attacks. I began finding it more difficult to run. I had always run for exercise and I suddenly began to have difficulty doing what I had always been able to do prior to my exposure

to the environmental toxins after 9/11. I was experiencing shortness of breath and having problems with my nose and throat.

10. I sought medical treatment and it was determined that I had developed asthma. X-rays of my chest, and later a CT scan, found evidence of nodules on my lungs.

11. As a result of my exposure to the chemicals, dust, and ash emanating from Ground Zero and Fresh Kills Landfill in the days and months following 9/11, I have continued to suffer from medical issues. My nose, throat, and lungs have never recovered from the exposure. The nodules on my lungs must be monitored on an ongoing basis.

12. Following several years under the care of private physicians, I was informed of the World Trade Center Health Program (WTCHP). I contacted the Program to see if there was anything that could be done in addition to the treatment I was already receiving. My physical injuries and conditions were confirmed through the WTCHP and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

13. I continue to receive medical treatment for the injuries I suffered in the immediate aftermath of 9/11. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for chronic rhinitis, chronic sinusitis, and asthma. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 30 day of March, 2025.



Declarant Richard Daoust



November 29, 2016

RICHARD DAOUST

Dear RICHARD DAOUST:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. Your claim number is VCF0016743. Your Eligibility Form was determined to be substantially complete on November 28, 2016. As stated in the regulations and on the claim form, by filing a substantially complete Eligibility Form you have waived your right to file or be a party to a September 11th-related lawsuit.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the following injuries:

- CHRONIC RHINITIS
- CHRONIC SINUSITIS UNSPECIFIED
- UNSPECIFIED ASTHMA

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

What Happens Next

If you have been certified for treatment by the WTC Health Program for a condition not listed above, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

If you believe you have eligible injuries not treated by the WTC Health Program and you would like the VCF to consider those injuries before calculating your award, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information



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about your treatment in order to process your claim. All forms are available on the www.vcf.gov website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

If you do not have injuries other than those listed above, you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya
Special Master
September 11th Victim Compensation Fund

cc: NOAH H. KUSHLEFSKY